

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS --  
GALVESTON DIVISION

**MIKKI KALINA, ET AL.,**

Plaintiff,

v.

**JAMES BLACKSTOCK,**

Defendant.

C.A. No. 3:10-cv-00096

**Jury Trial Demanded**

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**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

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After a successful trial on the merits, and after post-trial Motions have been ruled upon, Plaintiffs file this Motion for Attorneys' Fees and Costs.

On July 15, 2011, a jury returned a verdict in favor of the Plaintiffs in the amount of \$3.2 million. The punitive damage award was remitted by the Court.

Plaintiffs are entitled to attorney's fees and costs under 42 U.S.C. Sec. 1983, and 42 U.S.C. Sec. 1988 (the Civil Rights Attorney's Fees Awards Act of 1976).

Plaintiff is seeking \$66,605.00 in Attorneys' fees.

Plaintiff is seeking \$4,982.69 in costs.

Attached to this Motion is the Declaration of Martin A. Shellist, and filed separately is Plaintiff's Taxable Bill of Costs.

Respectfully submitted,

By: /s/ Martin A. Shellist  
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**CERTIFICATE OF SERVICE**

I certify that all counsel of record who are Filing Users of the Electronic Case Files System of the Southern District of Texas have been served a true and correct copy of the foregoing by electronic submission for filing on November 8, 2011.

Anthony P. Griffin  
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/s/ Martin A. Shellist  
**MARTIN A. SHELLIST**